Exhibit F (Dkt. No. 42-6) REDACTED

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1
             FEDERAL TRADE COMMISSION
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3
   IN THE MATTER OF )
4
    TWITTER, INC., ) File No. C-1316
5
      a corporation, )
6
    ----)
7
8
9
10
                     Via Zoom
                     Wednesday, December 7, 2022
11
12
13
14
        The above-entitled matter came on for
15
    investigational hearing, pursuant to subpoena, at
16
    11:34 a.m.
17
18
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20
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2

Twitter, Inc. 12/7/2022

1	APPEARANCES:
2	
3	ON BEHALF OF THE FEDERAL TRADE COMMISSION:
4	REENAH KIM, ESQUIRE
5	ANNE COLLESANO, ESQUIRE
6	ANDREA ARIAS, ESQUIRE
7	RONNIE SOLOMON, ESQUIRE
8	Federal Trade Commission
9	600 Pennsylvania Avenue, N.W.
10	Washington, D.C. 20580
11	(202) 326-2272
12	rkim1@ftc.gov
13	
14	ON BEHALF OF TWITTER:
15	KATHERINE LEE MARTIN, ESQUIRE
16	Twitter, Inc.
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22	
23	
24	
25	

Kissner, Ph.D. Twitter, Inc. 12/7/2022 ON BEHALF OF THE WITNESS: ELLEN LONDON, ESQUIRE London & Stout 1999 Harrison Street Suite 655 Oakland, California 94612 (415) 862-8494 elondon@londonstoutlaw.com Also Present: Alex Gaynor, FTC

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Twitter, Inc. 12/7/2022

- 1 what you mean by a customer service organization.
- 2 BY MS. KIM:
- 3 Q It sounds like Twitter services, one
- 4 of their roles was to interface with people who
- 5 were using Twitter. Is that accurate?
- 6 MS. LONDON: Objection to form. It
- 7 misstates testimony.
- 8 THE WITNESS: Part of Twitter
- 9 service -- of the parts of Twitter service's jobs
- 10 that I saw, part of it was interfacing with
- 11 people outside the company in -- in very
- 12 structured and limited capacity. They weren't a
- 13 general customer service organization.
- 14 BY MS. KIM:
- 15 Q You said they were not?
- 16 A They were not a general customer
- 17 service organization.
- 18 Q Understood. Thank you.
- 19 As the head of privacy engineering,
- 20 when you first joined the company, did you
- 21 oversee or supervise the work of any other
- 22 personnel at Twitter?
- MS. LONDON: Objection. Vague.
- 24 THE WITNESS: At the time when I
- 25 started, I had no reports. I was building out a

27

Twitter, Inc. 12/7/2022

- 1 team. And I -- and I worked with lots of people
- 2 across the company, but I had no -- nobody
- 3 reporting to me at that time as I was brought in
- 4 to put together a team.
- 5 BY MS. KIM:
- 6 Q At some point did you start to have
- 7 people who reported directly to you?
- 8 A Yes.
- 9 Q And when was that?
- 10 A Oh, goodness.
- 11 Q You can give just an approximate time
- 12 frame if you're not sure of the exact date. Any
- 13 time I have a question you're not positive, you
- 14 can say this is my best estimate.
- 15 A I'm trying to remember exactly when
- 16 all of these reorgs went through. But I think
- 17 around the August-ish time frame. That was --
- 18 that was the biggest reorg where we brought --
- 19 where we brought a bunch of people in and made
- 20 some surrounding agreements around some of the
- 21 teams that remained federated.
- Q Was that August of 2021?
- 23 A August of 2021. What I can't remember
- 24 is I was also starting to hire people out, and I
- 25 can't remember whether that started before that

28

Twitter, Inc. 12/7/2022

- 1 reorg or after that reorg. We were making a big
- 2 push to hire somewhere around in there.
- 3 Q When you say that you started to hire
- 4 people out, what did you mean?
- 5 A So some of that team that I managed
- 6 for privacy engineering, specifically some of
- 7 that was people who were already at the company
- 8 who were already in a privacy team, we brought
- 9 the whole team in. There are some people who
- 10 were at the company already who were not on
- 11 privacy engineering who transferred into a
- 12 privacy engineering role, and there were some
- 13 people who were outside of the company who we
- 14 hired in to the privacy engineering team.
- 15 Q Thank you.
- 16 At some point did you change job
- 17 position at Twitter?
- 18 A Yes. In January 2022.
- 19 Q How did your job position change?
- 20 A At that point, I became the interim
- 21 CISO for Twitter on behalf of my head of privacy
- 22 engineering role.
- 23 Q By "CISO," you're referring to chief
- 24 information security officer?
- 25 A That is correct.

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Twitter, Inc. 12/7/2022

Q And while you were interim CISO, you continued to do your job duties as head of privacy engineering. Is that what you said?

A That is correct.

Q At some point did you transition from being the interim CISO to the full-time CISO or

7 permanent CISO?

8 A Yes.

9 Q And when was that?

10 A I believe we made the -- so I was

11 initially offered the permanent CISO role. I

12 wanted -- I wanted to make sure we had a

13 conversation about it after everything was in

14 place for that. I believe we made the final

15 decision about that several months later. But I

16 think it took until about April or May until the

17 paperwork went -- part of it went through. So --

18 Q Functionally, were the things you were

19 doing as interim CISO similar to what you did as

20 permanent CISO once the paperwork went through?

21 A Yes.

22 Q And after that April or May '22 time

23 period, after the paperwork formalized your role

24 as CISO, did you continue serving as the head of

25 privacy engineering as well?

30

Twitter, Inc. 12/7/2022

- 1 A I don't -- I don't know what the
- 2 formal title I ended up with, but I retained that
- 3 team and the responsibilities for that team, as
- 4 well as the CISO duties. I also took on the I.T.
- 5 department.
- 6 Q When you took on the I.T. department,
- 7 did that affect your day-to-day job duties and
- 8 responsibilities?
- 9 A Not substantially. I was primarily
- 10 concentrated on the security and privacy teams.
- 11 Alan Rosa the person we hired to be the VP for
- 12 I.T. is very, very good at I.T., and so he -- he
- 13 did most of the day-to-day work for that
- 14 department, and I provided oversight for him.
- 15 Q To your understanding, what
- 16 functionality did the I.T. department at Twitter
- 17 provide?
- MS. LONDON: Objection to form.
- 19 Vague.
- 20 BY MS. KIM:
- 21 Q Do you understand my question, Dr.
- 22 Kissner?
- 23 A I.T. department provided a range of
- 24 things. So this is going to be very, very
- 25 noncomprehensive. But that included things like

80

Twitter, Inc. 12/7/2022

- 1 possibly hear you both.
- 2 MS. LONDON: Thank you for the
- 3 reminder. And apologies.
- 4 BY MS. KIM:
- 5 Q Dr. Kissner, in your e-mail at Exhibit
- 6 1, you made a reference to company decisions by
- 7 new leadership that impaired the company's
- 8 ability to
- 10 Do you see that in your e-mail?
- 11 A Yes.
- 12 Q What company decisions were you
- 13 referring to?
- 14 A The first of these company decisions
- 15 was the decision to do that layoff that happened
- 16 about a week after the acquisition completed.
- 17 Q I'll get to that in a moment.
- 18 Any other company decisions that you
- 19 had in mind when you wrote this sentence?
- 20 A Yes. Actually -- yes, there were some
- 21 cost-cutting pressure and decisions that were --
- that were being put in place that also impaired
- 23 our ability to do that.
- 24 Q I'm sorry. Decisions that --
- 25 cost-cutting pressures and decisions that

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Twitter, Inc. 12/7/2022

1 impaired your ability to do what?

2 A To

Q I'm going to go through each of these

5 in a moment. I want to make sure I've got the

6 full list.

7 Any other company decisions that you

8 had in mind when you wrote this e-mail?

9 A The ongoing c

but that was a smaller factor than the

12 others.

13 For clarification, do you mean to ask

14 about

15 or d

or both?

17 Q I was going to get to both, but I was

18 going to try to break them down into steps.

19 A Great. Okay. That's -- that I

20 think -- that's all the factors that I can

21 remember were in my mind talking -- talking about

22 the

23 Q Let's start with the layoffs. Can you

24 elaborate more on how the layoffs -- I assume

25 these are the post-Musk acquisition layoffs that

82

Twitter, Inc. 12/7/2022

1 occurred about a week after he arrived?

- 2 A Yes.
- 3 Q Why did that factor into your decision
- 4 to leave?
- 5 MS. MARTIN: I instruct you not to
- 6 answer that question to the extent it calls for
- 7 attorney-client privilege.
- 8 Reenah, Lea has testified several
- 9 times -- multiple times now that her decision to
- 10 leave was based on the advice of counsel. So
- 11 each time you ask her like what -- how that
- 12 factored into her decision, I think it's calling
- 13 for privilege. I don't think that's what you're
- 14 meaning to do, but I think there's a way to
- 15 reformulate that question without calling for
- 16 that.
- MS. KIM: Sure.
- 18 BY MS. KIM:
- 19 Q So Dr. Kissner, you talked about
- 20 company decisions that were made by new
- 21 leadership in this e-mail, correct?
- 22 A Yes.
- 23 Q And I asked you what those decisions
- 24 were. You mentioned layoffs.
- 25 A Company decisions that impaired the

83 Kissner, Ph.D. 12/7/2022 Twitter, Inc. 3 Without disclosing privileged information, how did the layoffs affect the 5 So on multiple ways. I'm going to try 8 to go through each of them and organize this as 9 best as I can. 10

Q Understood. When you said that the
large numbers of people that were laid off had an
impact on

84 Kissner, Ph.D. Twitter, Inc. 12/7/2022 11 Apologies. I need to ask a privilege question. 12 MS. KIM: Sure. Off the record. 13 (A brief recess was taken.) 14 BY MS. KIM: Dr. Kissner, before we took that 15 16 break, I was asking you about s you reference in your e-mail. You mentioned 18 21 Were there any other that you had in mind when 23 you were talking about how the layoffs -- excuse 24 me -- that you had in mind when you wrote this 25

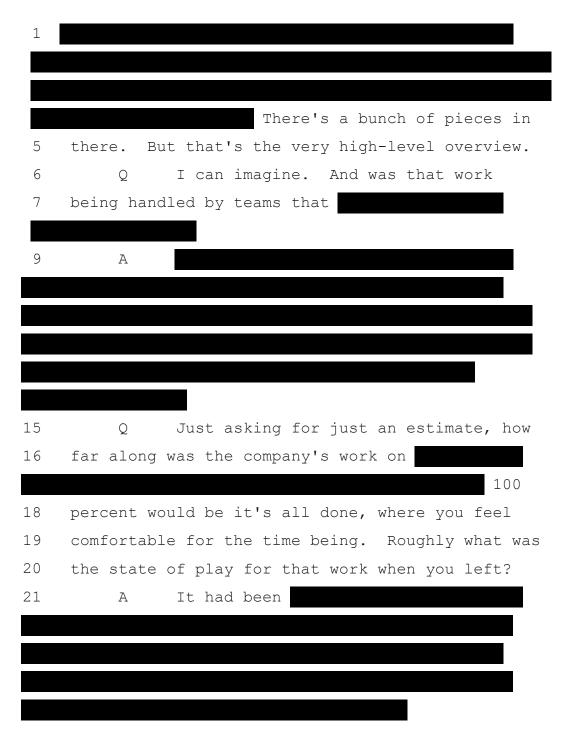
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e-mail?

Kissner, Ph.D. Twitter, Inc. 12/7/2022 1 Those were the ones that I had the 2 most stake about. Those are the ones I was thinking about most -- most immediately. 3 4 What is the -- can you explain more 5 what you meant when you said that -- when identified 17 And what work did that entail to add 18 those additional protections? 19 There's a lot of pieces in that Α 20 program.

Kissner, Ph.D.

Twitter, Inc. 12/7/2022



Kissner, Ph.D. 12/7/2022 Twitter, Inc. I understand. I appreciate that. 1 2 It's helpful. On the -- another technical 3 4 improvement you mentioned was the Do you recall that? 6 7 Α Yes. 8 Can you tell me more about what that 9 actually was? 10 Α There are multiple stages in that project. The first -- the first two really big, 11 12 big

Kissner, Ph.D. Twitter, Inc. 12/7/2022 3 Thank you. That is very helpful. 4 Thank you. 5 And we're going -- I'm going -- is there another way to refer to --10 14 Okay. We may have to when we get into 15 some documents later on today. I appreciate 16 that. And then at a high level we're going to spend more time talking about this later. But at 17 a high level, could you just describe what the 18 19 entailed? 20 23 And at the time that you left the company -- and again, just asking for estimate. 24

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is pretty

25

So if 100 percent is

Was

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1 So in order to -- so one of the -- one 2 of the programs that we had going on was the --3 8 There's a lot of moving pieces in 9 doing that kind of work, right. And that was 10 affected both by the layoffs and by the 11 cost-cutting measures because the company chose 12 to layoff most of the team that was doing that 13 work. And I had told them if they wanted to lay 14 them off, they were going to immediately have to 15 , which ran into the no, we 16 don't want to -- we want to cut costs instead. 17 Which team were you referring to, the one that was nearly all laid off? 18 19 Α They were at least half laid off. I 21 don't remember the exact number. 22 I thought you had just mentioned you 23 had conveyed to somebody were that to get --

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24

work -- the

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- 1 that your testimony?
- 2 A Yes. I had conveyed many times that
- 3

- 12 Q Who did you convey your concerns to
- 13 regarding how critical was to these
- 14 ongoing efforts?
- MS. LONDON: Reminder to not
- 16 communicate any discussions with lawyers.
- 17 THE WITNESS: Outside of discussions
- 18 with lawyers, during the course of the layoffs
- 19 and the layoff planning, I conveyed these
- 20 concerns to everybody -- there were approximately
- 21 eight different layoff plans that were -- that I
- 22 was involved in over the course of those few
- 23 days.
- I was extremely persistent in
- 25 conveying that we -- in order to keep running the

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Twitter, Inc. 12/7/2022

- 1 business, we need -- and to protect our users,
- 2 business continuity was high on -- higher on
- 3 people's mind at that particular moment, that we
- 4 needed to not only maintain a

- There was a bunch of people that Elon
- 13 brought in, including like the CTO, CIO of Tesla,
- 14 a bunch of very senior Tesla folks. So I told
- 15 them this many, many times.
- 16 Q And were you asked to make
- 17 recommendations on which personnel would be cut
- 18 from your organization?
- 19 A Yes.
- 20 Q And did the group that was making
- 21 those decisions take -- let me break it up.
- In your view, were your
- 23 recommendations about who should be cut, were
- 24 those recommendations taken into consideration
- 25 when the final layoff decisions were made, if you

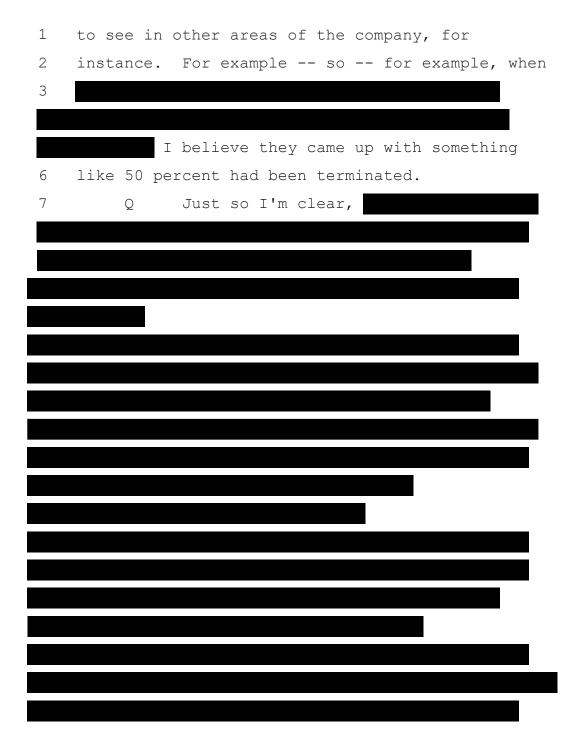
Kissner, Ph.D.

Twitter, Inc. 12/7/2022

- 1 know?
- 2 A So in my -- for the people inside my
- 3 organization, I believe the recommendations were
- 4 taken into consideration, but people were cut who
- 5 I had not recommended to cut, and I actually
- don't entirely know who because nobody shared the
- 7 layoff list with me.
- 8 Q Didn't you ask for the layout to see
- 9 the final layoff list?
- 10 A Yes, but I was not given access to the
- 11 list after even -- after the layoffs had taken
- 12 place. It was -- yeah. I did not know who --
- 13 who was working at the company after the layoffs.
- 14 Q Is it fair to say that after the
- 15 layoffs took place, you -- without having a list
- 16 of what the final cuts were, you yourself
- 17 observed that there were some personnel who had
- 18 been cut that you would not have wanted to be
- 19 cut?
- 20 A Yes.
- 21 Q Were any of the people that you
- 22 learned had been terminated in fact people that
- 23 you had said were critical and needed to be kept
- 24 on?
- 25 A Yes, but a number of those are easier

Kissner, Ph.D.

Twitter, Inc. 12/7/2022



Kissner, Ph.D.

Twitter, Inc. 12/7/2022

analysis on user data. 9 Thank you. So back to Exhibit 1. 10 that second sentence? 11 MS. LONDON: Sorry, Reenah. We moved 12 the computer away. 13 MS. KIM: Where is Dr. Kissner? 14 MS. LONDON: She's getting the 15 computer. 16 MS. KIM: I looked down for a second, and they were gone. 17 18 THE WITNESS: Magic. 19 MS. LONDON: Okay. We have it. 20 BY MS. KIM: 21 On Exhibit 1, your resignation e-mail, 22 in the second sentence you had said -- you said 23 you thought you were being exposed to great 24 personal risk based on company decisions by new 25 leadership that

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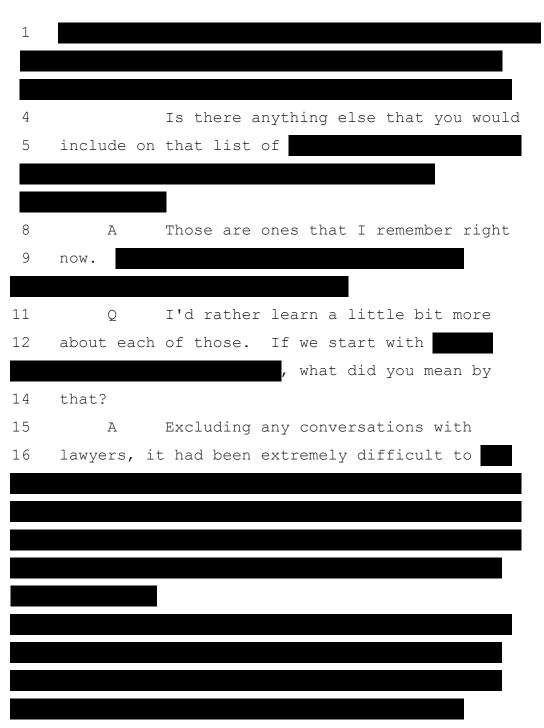
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1 2 When you made that reference to new 3 leadership, did you have someone in particular in 4 mind or some people in mind? 5 The company decisions by new 6 leadership that were in mind Elon Musk and Alex Spiro and the folks 8 9 that Elon had brought in from like Tesla and 10 other companies. 11 So the next subject on this memo, this 12 e-mail, it says -- you go on to state "Further, 13 these actions have effectively 16 Do you see that in your e-mail? 17 Α Yes. 18 What did you mean by the Q 21 MS. LONDON: Just to interject, they 22 can testify as to things that were in place but 23 not as to the extent that they were required by 24 law. 25 MS. KIM: Sure. I'm just -- I just --

115 Kissner, Ph.D. Twitter, Inc. 12/7/2022 1 MS. LONDON: I think it's fine. I 2 just want to put that on the record. MS. KIM: Understood. Understand. 3 just wanted to understand which 4 Dr. Kissner had in mind when they wrote this sentence in the e-mail. 7 THE WITNESS: So the first one is

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Twitter, Inc. 12/7/2022

1 information from your perspective, did you get a 2 sense as to whether there were any other teams 3 associated with the security controls that had also been affected by the layoffs? 5 I don't know about the security controls. I have better answers for privacy 6 7 projects, right. And again, recognizing you did not 8 9 have perfect visibility into who was actually laid off, what was your impression of how the 10 layoffs affected employee -- personnel who worked 11 on the privacy and product side of things? 12 13 A number of the privacy -- the privacy 14 technical improvements 22 Was there any other aspects of the 23

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by the

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1 actions taken by new leadership at the company?

2 A Given the number of people who were

3 associated with

12 O Understood.

13 A The other -- once we tracked down

14 somebody to even ask, the other problem that we

15 would have run into is that they were getting

16 conflicting priorities from Elon and Elon's team

in some cases.

18 Like Twitter Blue Verified has to

19 launch right now. We need to do this thing right

20 now. We need to do this thing right now, and

21 that's with teams that are so reduced in size

22 that they are

23 And the thing that we all told everybody from

24 Elon's side repeatedly during -- during that

25 layoff planning was that a whole lot of people

Kissner, Ph.D.

Twitter, Inc. 12/7/2022

- 1 were going to quit, right. So it's not just the
- 2 layoff. It's often the best people on those
- 3 teams who are the ones you want to keep, they
- 4 quit or were planning to quit as fast as
- 5 possible. Not in all cases, but in a very
- 6 significant number.
- 7 So given new priorities coming in and
- 8 with a "You need to stay all night, you need to
- 9 work on this until it's done" kind of priority,
- 10 the need to keep the systems up, the security
- 11 stuff becomes really hard to reconcile with that
- 12 situation.
- 13 Q Was it your sense that

- 17 A At that time, yes, that was my
- 18 impression that

- Q We talked a bit earlier about the
- 25 layoffs that occurred, and I think I recall you

Kissner, Ph.D.

Twitter, Inc. 12/7/2022

1 THE WITNESS: Not without implicating 2 privilege. BY MS. KIM: 3 4 And you made a reference to potential 5 consequences for their actions. What can you tell me without revealing privileged information 6 you had in mind when you talked about -- when you 7 wrote that there would be potential consequences 8 for their action? 9 10 MS. LONDON: Objection. Privileged. 11 Calling for privileged information, I believe. MS. KIM: It is not. You can answer 12 13 without revealing the privileged information. 14 MS. LONDON: Without implicating what 15 you heard from lawyers. 16 THE WITNESS: So there's some stuff 17 that isn't, I think. I'm not a lawyer. 18 MS. LONDON: Do you want -- Katherine, 19 just one last breakout. 20 MS. MARTIN: Let's breakout.

21

22

23

24

stuff, there are

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MS. KIM: Off the record.

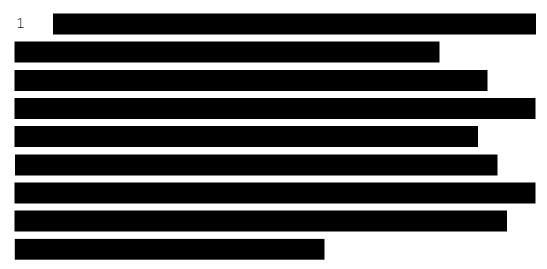
(Discussion off the record.)

THE WITNESS: Without any privileged

238 Kissner, Ph.D. 12/7/2022 Twitter, Inc. BY MS. KIM: 7 I'm so sorry. Can you repeat that 8 part? It sounded muffled on mine. I don't know if Tammy was able to catch it all. 10

Kissner, Ph.D.

Twitter, Inc. 12/7/2022



- 10 Q To your knowledge, have any of those
- 11 consequences that you feared may come to pass
- 12 actually happened at this point? You may not --
- 13 to the extent you know. You may not.
- 14 A I have limited -- very limited
- information about what's going on in the systems
- 16 at this point. Twitter Blue, it did play out
- 17 exactly like one would have expected it to play
- 18 out, and that wasn't good.
- 19 Q Do you mean with respect to the
- 20 impersonations?
- 21 A Yes. With respect to the
- 22 impersonations. But I'm even more worried about
- 23

Kissner, Ph.D.

Twitter, Inc. 12/7/2022

1	CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2	I, Tammy S. Newton, the officer before
3	whom the foregoing proceedings was taken, do
4	hereby certify that the foregoing transcript is a
5	true and correct record of the proceedings; that
6	said proceedings were taken by me
7	stenographically and thereafter reduced to
8	typewriting under my supervision; and that I am
9	neither counsel for, related to, nor employed by
LO	any of the parties to this case and have no
L1	interest, financial or otherwise, in its outcome.
L2	IN WITNESS WHEREOF, I have hereunto set
L3	my hand and affixed my notarial seal this 9th day
L 4	of December, 2022.
L5	My commission expires:
L 6	3/05/2026
L7	1 Maiston
L8	Tanny & Newton
L 9	Notary Public in and for the
20	State of Maryland
21	
22	
23	
24	
25	

CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Lea Kissner

WITNESS NAME

WITNESS: Lea Kissner

DATE: December 7, 2022

CASE: United States of America v. Twitter, USDC Case No. 3:22-cv-

3070

Please note any errors and the corrections thereof on this errata sheet. The rules require a reason for any change or correction. It may be general, such as "To correct stenographic error," or "To clarify the record," or "To conform with the facts."

PAGE.LINE	CORRECTION	REASON FOR CHANGE
16.20	Effect → respect	To clarify the
		record
19.16	"left out" "left there"	To clarify the
		record
20.20	business basic → business facing	To clarify the
		record
32.16	right after → right after he started [as	To clarify the
	CEO]	record
35.11	got then → got them	To clarify the
		record
43.21	OCTA → Okta	To clarify the
		record
43.22	OCTA → Okta	To clarify the
		record
52.17	RXCs → RFCs	To clarify the
		record
53.24	automatization → anonymization	To clarify the
		record
53.25	automatization → anonymization	To clarify the
		record
57.7	we're → were	To clarify the
		record
58.11	Kramer → Cranor	To clarify the
		record
58.25	exams → exam	To clarify the
		record
85.2	stake → state	To clarify the
	Cau The Decayd Inc	record

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88.20	OCTA → Okta	To clarify the
		record
91.22	deleted from → deleted, from	To clarify the
		record
93.14	prog → non-prod	To clarify the
		record
96.22	It is not \rightarrow Two, it is not (I don't know if	To clarify the
	I said that, but that's the second category)	record
96.22	is it user → three, is it user (I don't know	To clarify the
	if I said that, but that's the third	record
	category)	
00 0	nunquahla nangahla	ma alamifu tha
98.2	pursuable → parsable	To clarify the
101 10	security governance risk and → security	record
101.19	governance, risk, and	To clarify the record
	governance, 115k, and	record
103.10	Warren → Boring	To clarify the
	_	record
104.8	<pre>[not me] for the layout → after the layoff</pre>	To clarify the
		record
105.20	<pre>[not me] respectfully → respectively</pre>	To clarify the
		record
115.9	litigations → mitigations	To clarify the
		record
120.7	put → pushed	To clarify the
		record
124.12	extension → exception	To clarify the
		record
126.11	where those → of those	To clarify the
		record
128.5	direction → directive	To clarify the
	11.00	record
132.23	different → current	To clarify the
4.6.0		record
146.9	going to → going to be	To clarify the
150.00		record
150.22	privacy engineers → privacy engineering	To clarify the
1 - 1 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		record
151.17	frame → stream	To clarify the
151 04	live → wide	record
151.24	TIVE → WIGE	To clarify the
150 <i>6</i> 0	Hey, finance, tell us all the things are	record
158.6-8	that critical financial records so we can	To clarify the record
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	not delete the	
160	prog → prod	To clarify the
		record
167.4-5	housed project engineering → housed in	To clarify the
	privacy engineering	record
170.11	lay → wave	To clarify the
170 10		record
172.19	ruled → rolled	To clarify the
1711		record
174.11	[not me] lift → list	To clarify the
		record
173.18-19	"it's not enough to say somebody can call	To clarify the
	the file service. Someone can't call the file service" → "it's not enough to say	record
	somebody can/can't call the file service"	
	Someway can, can a carr one rire bervice	
174.1	"means can you call the service, can you not	To clarify the
	call" → "means can you call/not call the	record
	service"	
182.6	education → edge cases	To clarify the
		record
195.1	SRA → SRE	To clarify the
		record
204.15	Apple → ACL	To clarify the
		record
204.15	Aurora, may of those → Aurora/MesOS	To clarify the
		record
211.3	not me] Spiros → Spiro	To clarify the
		record
211.7	not me] Spiros → Spiro	To clarify the
011 14		record
211.14	not me] Spiros → Spiro	To clarify the
010 0		record
212.3	Spiros → Spiro	To clarify the
004 16		record
224.16	seemed thrilled → didn't seem thrilled	To clarify the
001 6	1:	record
231.6	licensee → license	To clarify the
000 5		record
232.7	site → side	To clarify the
000 5	, ,	record
233.5	hey → because	To clarify the
		record

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238.5	productions → protections	To clarify the
		record